

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

vs.

GRANDE COMMUNICATIONS  
NETWORKS LLC and PATRIOT MEDIA  
CONSULTING, LLC,

Defendants.

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Civil Action No. 1:17-cv-00365-LY

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL  
CERTAIN EXHIBITS TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY  
JUDGMENT AS TO GRANDE COMMUNICATIONS NETWORKS LLC'S  
DMCA SAFE HARBOR DEFENSE**

Plaintiffs move the Court for leave to file under seal certain exhibits to Plaintiffs' Motion for Partial Summary Judgment as to Grande Communications Networks LLC's DMCA Safe Harbor Defense. As set forth below, Grande has designated certain documents, discovery responses and deposition testimony as either Attorneys' Eyes Only or Confidential under the Confidentiality and Protective Order entered in this case.

While not conceding that the documents, discovery responses or deposition excerpts merit the Attorneys' Eyes Only or Confidential designations under the protective order, Plaintiffs seek leave to file them under seal, as required by the Court's Protective Order based on the current designations.

In particular, Plaintiffs seek to file the following exhibits to the Motion for Partial Summary Judgment as to Grande Communications Networks LLC's DMCA Safe Harbor Defense:

**ATTORNEYS' EYES ONLY DESIGNATION:**

Exhibit A: Summary Judgment Appendix

Exhibit B: Excerpts from Christianson Deposition (Vol. II)

Exhibit F: P-57 (GRANDE0000155)

Exhibit J: Grande's Third Amended Objections and Responses to Plaintiffs' First Set of Interrogatories dated November 24, 2017

Exhibit K: Excerpts from Bloch Deposition

Exhibit R: PX-169 (GRANDE2539474)

**CONFIDENTIAL DESIGNATION:**

Exhibit D: PX-90

Exhibit H: PX-60

Exhibit M: PX-91

Exhibit P: Grande's Supplemental Answers to Interrogatories 11 and 15 dated January 2, 2018

Exhibit S: PX-137 (GRANDE0000115)

As set forth below, Defendants do not oppose the requested relief.

Dated: August 8, 2018

Respectfully submitted,

By: /s/ Daniel C. Bitting

Pat A. Cipollone, P.C. (admitted *pro hac vice*)

Jonathan E. Missner (admitted *pro hac vice*)

Robert B. Gilmore (admitted *pro hac vice*)

Philip J. O'Beirne (admitted *pro hac vice*)

**Stein Mitchell Cipollone Beato & Missner LLP**

1100 Connecticut Avenue, NW Suite 1100

Washington, DC 20036

Telephone: (202) 737-7777

Facsimile: (202) 296-8312

pcipollone@steinmitchell.com

jmissner@steinmitchell.com

rgilmore@steinmitchell.com

pobeirne@steinmitchell.com

Daniel C. Bitting (State Bar No. 02362480)  
Paige A. Amstutz (State Bar No. 00796136)  
**Scott Douglass & McConnico LLP**  
303 Colorado Street, Suite 2400  
Austin, TX 78701  
Telephone: (512) 495-6300  
Facsimile: (512) 495-6399  
dbitting@scottdoug.com  
pamstutz@scottdoug.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

I certify that counsel for Plaintiffs conferred with counsel for Defendants regarding the foregoing Motion for Leave. Defendants' counsel does not oppose the requested relief.

By: /s/ Philip J. O'Beirne  
Philip J. O'Beirne

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on August 8, 2018, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document electronically.

/s/ Daniel C. Bitting  
Daniel C. Bitting